

**EXHIBIT B**

**Motion for Leave to File Out of Time**

Barbara Ann Johnson  
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In The United States Bankruptcy Court For The District of Delaware  
The Honorable Judge Mary F. Walrath  
Case 22-11225-MFW

#### FOURTH SUBSTANTIVE OMNIBUS OBJECTIONS TO CLAIMS

#### **MOTION FOR LEAVE TO FILE OUT OF TIME**

#### **INTRODUCTION**

1. Barbara Ann Johnson, the party that brings proof of claim, in the above-captioned matter, respectfully moves this Honorable Court for leave to file **MOTION TO STRIKE FALSE CLAIM FOR DISALLOWANCE** after the deadline, due to circumstances of fraudulent eviction and misconduct by the opposing party that have hindered my ability to meet the original deadline.

#### **FACTUAL BACKGROUND**

2. This case involves a false claim of substitute trustee by a mortgage servicer named CELINK that stated they were the new servicer since February 2nd, 2023. On July 31, 2023, the opposing party, REVERSE MORTGAGE INVESTMENT TRUST INC., et al., Debtors,, filed a claim for disallowance, wherein they inaccurately and falsely stated that the mortgage servicing rights were transferred to "Carrington" instead of the mortgage servicer who filed a notice of substitute trustee in a Bexar County court AND sold my property located at 11705 Smoking Oaks St, Live Oak, TX 78233-3119, "Celink", under false pretense.

#### **REASONS FOR THE REQUEST**

3. The fraudulent eviction and misconduct by the opposing party have created exceptional and unforeseen circumstances that have made it impossible for me to meet the original deadline for filing **MOTION TO STRIKE FALSE CLAIM FOR DISALLOWANCE**.

4. The false claim for disallowance not only misleads the court but also has caused harm to Barbara Ann Johnson by delaying the resolution of this matter and causing unnecessary confusion and has left Barbara Ann Johnson homeless after the false eviction.

#### **SUPPORTING EVIDENCE**

5. In support of this motion, Barbara Ann Johnson submits the following evidence:

- a. Notice of Substitute Trustee Filed in The Bexar County Court by “Celink”, NOT “Carrington”.

#### **REQUEST FOR RELIEF**

6. Barbara Ann Johnson, respectfully requests that this Honorable Court grant leave to file **MOTION TO STRIKE FALSE CLAIM FOR DISALLOWANCE** out of time and extend the filing deadline to accommodate my efforts to address the fraudulent eviction, the opposing party's misconduct, and participate fully in the legal proceedings.

#### **CONCLUSION**

Barbara Ann Johnson, the party that brings proof of claim, respectfully urges this Honorable Court to grant the requested leave to file out of time, recognizing the extraordinary circumstances surrounding the fraudulent eviction and misconduct that have necessitated this motion.

Respectfully submitted,

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